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6 EQUIFAX INFORMATION SERVICES LLC
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

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11 JILL DALE,
12 Plaintiffs,
13 v.
14 WHEELS FINANCIAL GROUP, LLC dba
15 LOANMART, TARGET
16 CORPORATION, EQUIFAX
INFORMATION SERVICES LLC and
DOES 1 through 10 inclusive,
17 Defendants.
18

Case No. 2:21-cv-00150-KJM-AC

**STIPULATION TO EXTEND TIME
TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE
THAN 28 DAYS (L.R. 144)**

**COMPLAINT SERVED:
DECEMBER 24, 2020
CURRENT RESPONSE DATE:
FEBRUARY 2, 2021
NEW RESPONSE DATE:
MARCH 5, 2021**

19 Pursuant to Local Rule 144(a), Plaintiff Jill Dale (“Plaintiff”) and Defendant
20 Equifax Information Services LLC (“Equifax”) (collectively “the Parties”), by and
21 through their respective counsel, hereby stipulate as follows:
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- 23 1. On December 14, 2020, Plaintiff filed her Complaint against Defendant,
Equifax, in the Superior Court of the State of California, County of Sacramento, titled *Jill*
Dale v. Wheels Financial Group, LLC, et al; Case No. 34-2020-00290860.
- 24 2. Plaintiffs served their Complaint on Equifax on December 24, 2020.
- 25 3. Equifax’s response to the Complaint was currently due on January 25, 2021.

26 AMENDED STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT BY NOT MORE THAN
27 28 DAYS (L.R. 144)

1 4. On January 14, 2021, Defendant Equifax submitted its Answer to Plaintiff's
2 Complaint and Affirmative and Other Defenses to the Clerk of the Superior Court.

3 5. On January 26, 2021, co-defendant Target Corporation timely removed this
4 matter to the United States District Court Eastern District of California. (ECF No. 1).

5 6. On February 19, 2021, defendant Equifax became aware of the removal
6 when it attempted to file a Notice of Substitution of Counsel with the Superior Court of
7 Sacramento County. Equifax simultaneously became aware that the Answer Plaintiff
8 submitted to the Superior Court was inadvertently not processed due to the timing of the
9 removal.

10 7. On March 1, 2021, Equifax's counsel conferred with plaintiff's counsel
11 regarding the basis for its need for an extension. Plaintiff's counsel had no objection and
12 provided his assent.

13 NOW THEREFORE, the Parties hereby stipulate and agree to an extension of time
14 for Defendant to answer or otherwise respond to Plaintiff's Complaint through and
15 including March 5, 2021 and pursuant to Local Rule 144(a).

16 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

17 Respectfully submitted on March 4, 2021

19 By: /s/ Thomas P. Quinn, Jr.

20 Thomas P. Quinn, Jr.
21 Attorneys for Defendant
22 EQUIFAX INFORMATION
23 SERVICES LLC

19 By: /s/ Todd M. Friedman

20 Todd M. Friedman
21 Attorney for Plaintiff
22 JILL DALE

23 **IT IS SO ORDERED.**

24 **DATED: March 4, 2021 (Nunc pro tunc)**

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CHIEF UNITED STATES DISTRICT JUDGE